

BURR & FORMAN MCNAIR

Margaret M. Fox
pfox@burr.com
Direct Dial: 803.799.9800
Direct Fax: 803.753.3278

Burr & Forman, LLP
1221 Main Street
Suite 1100
Columbia, SC 29201
Mailing Address
Post Office Box 1100
Columbia, SC 29201

Office (803) 799-9800
Fax (803) 753-3278

BURR & C

June 28, 2019

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

**Re: 2019 Annual ETC Report of Palmetto Telephone Communications, LLC
Docket Nos. 2012-236-C and 2019-14-C**

Dear Ms. Boyd:

Enclosed for filing pursuant to S.C. Code Ann. Regs. 103-690.1 please find the 2019 Annual ETC Report of Palmetto Telephone Communications, LLC.

Please contact me if you have any questions concerning the attached report. Thank you for your assistance.

Sincerely,

Burr & Forman LLP



Margaret M. Fox

MMF:khh

Enclosure: as stated

cc: Jeffrey M. Nelson, Esquire, ORS
Kari Munn, ORS
Valerie Ancrum, Palmetto Telephone Communications, LLC

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Application of Palmetto Telephone)	
Communications, LLC for Designation as an)	Docket No. 2012-236-C
Eligible Telecommunications Carrier)	
)	

Request for Certification of the Use of Universal)	
Service Funds Pursuant to 47 C.F.R. 54.314 and)	Docket No. 2019-14-C
Telecommunications Act Section 254(e), Federal)	
Communications Commission CC Docket No.)	
96-45 (Form 481); and Annual Reports for ETCs)	

ANNUAL ETC REPORT OF PALMETTO TELEPHONE COMMUNICATIONS, LLC

Pursuant to S.C. Code Ann. Reg. § 103-690.1, Palmetto Telephone Communications, LLC (“Palmetto”) hereby files this Annual ETC Report. The South Carolina Public Service Commission (“Commission”) designated Palmetto an Eligible Telecommunications Carrier (“ETC”) by its Order No. 2012-739 in Docket No. 2012-236-C. Palmetto was designated for purposes of receiving low-income (Lifeline) support only, and did not request designation to receive federal High Cost Support. Therefore, pursuant to Reg. § 103-690.1(B)(11), Palmetto must comply with the reporting requirements set forth in Reg. § 103-690.1(B)(3)-(10). Palmetto is providing this report solely for purposes of the state reporting requirement, and will separately comply with all federal reporting requirements that may apply to Palmetto. Palmetto respectfully submits the following:

103-690.1(b)(3) – Number of requests for service from potential customers that were unfulfilled

Palmetto had 0 unfulfilled requests for service during the 2018 calendar year.

103-690.1(b)(4) – Number of complaints or trouble reports per 1000 handsets or access lines

Palmetto had 0 complaints per 1,000 access lines for the 2018 calendar year.

103-690.1(b)(5) – Certification of compliance with applicable service quality standards and consumer protection rules

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto is in compliance with applicable service quality standards and consumer protection rules.

103-690.1(b)(6) – Report and Certification of ability to function in emergency situations

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto is able to remain functional in emergency situations. Palmetto has a reasonable amount of back-up power to ensure functionality without an external power source; is able to reroute traffic around damaged facilities; and is capable of managing traffic spikes resulting from emergency situations.

103-690.1(b)(7) – Certification regarding provision of comparable local usage plan

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto offers a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas.

103-690.1(b)(8) -- Certification regarding equal access

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto acknowledges that the Federal Communications Commission may require Palmetto to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

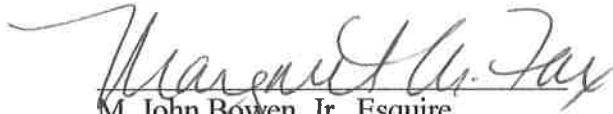
103-690.1(b)(9) – Number of Lifeline customers

Palmetto had 92 Lifeline customers as of December 31, 2018. Palmetto did not provide Link Up assistance, as that program is no longer supported by federal universal service funding.

103-690.1(b)(10) – Copies of responses to Lifeline Verification Survey or Certification filed with USAC on August 31 of each year

USAC now requires Lifeline service providers to file the annual verifications required by 47 C.F.R. §54.416 by **January 31** of each year. Attached as Exhibit B is a copy of Palmetto's Form 555, which was filed with USAC and with the Commission in January 2019.

Respectfully Submitted,



M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
BURR & FORMAN LLP
1221 Main Street, Suite 180
Columbia, South Carolina 29201
Telephone: (803) 799-9800
Facsimile: (803) 753-3278
Email: jbowen@burr.com;
pfox@burr.com

Attorneys for Palmetto Telephone
Communications, LLC

June 28, 2019

Columbia, South Carolina

EXHIBIT A

AFFIDAVIT OF JASON J. DANDRIDGE

STATE OF SOUTH CAROLINA)
COUNTY OF COLLETON)

BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Application of Palmetto Telephone)
Communications, LLC for Designation as an) Docket No. 2012-236-C
Eligible Telecommunications Carrier)
)

Request for Certification of the Use of Universal)
Service Funds Pursuant to 47 C.F.R. 54.314 and) Docket No. 2019-14-C
Telecommunications Act Section 254(e), Federal)
Communications Commission CC Docket No.)
96-45 (Form 481); and Annual Reports for ETCs)

AFFIDAVIT OF JASON J. DANDRIDGE

PERSONALLY APPEARED BEFORE ME the undersigned WHO, BEING DULY
SWORN, deposed and said:

1. My name is Jason J. Dandridge, and I am a citizen of the State of South Carolina.
I am of sound mind and am over the age of twenty-one years.
2. I am competent to testify to the matters stated herein.
3. The matters stated herein are based on my personal knowledge.
4. I am the Chief Executive Officer for Palmetto Telephone Communications, LLC
("Palmetto").

5. I hereby certify that Palmetto is complying with applicable service quality standards and consumer protection rules, as designated by the Public Service Commission of South Carolina (“Commission”).

6. I hereby certify that Palmetto does and will continue to satisfy applicable consumer protection and service quality standards.

7. I hereby certify that Palmetto is able to function in emergency situations. Palmetto has a reasonable amount of back-up power to ensure functionality without an external power source; is able to reroute traffic around damaged facilities; and is capable of managing traffic spikes resulting from emergency situations.

8. I hereby certify that Palmetto is offering local usage plans comparable to those offered by the incumbent LECs in the service areas in which Palmetto provides competitive service.

9. I hereby certify that Palmetto acknowledges that the Federal Communications Commission may require Palmetto to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

[Signature page follows.]

FURTHER AFFIANT SAYETH NOT.



Jason J. Dandridge
Chief Executive Officer
Palmetto Telephone Communications, LLC

Subscribed to and sworn before me this 20th day of June 2019.

Karen L Bridge

NOTARY PUBLIC FOR SOUTH CAROLINA

Karen L Bridge

Printed Name of Notary

My Commission Expires: April 10, 2024

EXHIBIT B

**PALMETTO TELEPHONE
COMMUNICATIONS , LLC**

FORM 555, JANUARY 2019

Annual Lifeline Eligible Telecommunications Carrier Certification Form All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

<u>249023</u>		<u>143022355</u>
Study Area Code (SAC)		Service Provider Identification Number (SPIN)
(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).		
<u>2018</u>	<u>SC</u>	<u>Palmetto Telephone Communications</u>
Recertification Year	State	ETC Name
<u>N/A</u>		<u>Palmetto Rural Telephone Cooperative</u>
DBA, Marketing, or Other Branding Name		Holding Company Name
(If same as ETC name, list "N/A" Do <u>not</u> leave blank)		(If same as ETC name, list "N/A" Do not leave blank)

Does the reporting company have affiliated ETCs?

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name

ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements? Yes ☐ No ☒

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Initial Certification *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial DJW

Minimum Service Level

I certify that the company listed above is in compliance with the minimum service levels set forth in the 47 CFR Section 54.408.

I am an officer of the company named above. I am authorized to make this certification for the SACs listed above.

Initial DJW

Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

Report the number of Lifeline subscribers due for recertification by month (January-December)

- A. Subscribers eligible for recertification by anniversary month
 B. Subscribers de-enrolled prior to recertification attempts
 C. Total number of subscribers ETC is responsible for recertifying (A-B)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
A.	36	16	7	4	6	5	8	9	16	0	15	0	122
B.	0	0	0	0	0	0	0	0	0	0	0	0	0
C.	36	16	7	4	6	5	8	9	16	0	15	0	122

Recertification Methods**State of federal database**

- D. Subscribers recertified through ETC access to state or federal database by anniversary month

Report the number of eligible subscribers verified through access to a state or federal database.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
D.	0	0	0	0	0	0	0	0	0	0	0	0	0

- E. Name of the data source(s) used to verify consumer eligibility:

ETC Direct Contact

- F. Subscribers contacted by ETC directly to recertify (You may also use this section to report subscriber initiated recertifications).

Report the number of Lifeline subscribers the ETC contacted directly to obtain recertification of eligibility

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
F.	0	0	0	0	0	0	0	0	0	0	0	0	0

- G. Subscribers who failed to recertify through ETC direct outreach attempt

Report the number of Lifeline subscribers de-enrolled due to ineligibility or non-response to the ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
G.	0	0	0	0	0	0	0	0	0	0	0	0	0

H. Subscribers who recertified through ETC direct outreach attempt

Report the number of Lifeline subscribers that successfully recertified through ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
H.	0	0	0	0	0	0	0	0	0	0	0	0	0

Third Party

I. Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC

Report the number of Lifeline subscribers contacted by a state administrator, third party administrator, or USAC for the purpose of recertification.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
I.	36	16	7	4	6	5	8	9	16	0	15	0	122

J. Name of third party administrator used to verify subscriber eligibility:

USAC

K. Subscribers de-enrolled as a result of a third party recertification attempt

Report the number of subscribers as a result of ineligibility or non-response to outreach from a state administrator, third party administrator, or USAC.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
K.	20	10	5	2	3	4	4	5	12	0	6	0	71

L. Subscribers who recertified through a state administrator, third party administrator, or USAC's recertification effort

Report the number of subscribers that recertified through a request from a state administrator, third party administrator, or USAC

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
L.	16	6	2	2	3	1	4	4	4	0	9	0	51

Certification:**Recertification Method: Database**

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on a database. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

Recertification Method: ETC

I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

Recertification Method: Third Party

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on an administrator. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial DJW

No Subscribers

I certify that my company did not claim federal low income support for any Lifeline subscribers for the current Form 555 data year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

$M = (G+K)$	$N = (D+F+I)$	$O = M/N \times 100$
Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
71	122	58.19%

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Dewaine Wilson, CFO

Signature of Officer

dewaine.wilson@prtc.coop

Email Address of Officer

Person Completing This Certification Form

Dewaine Wilson, CFO

Printed Name and Title of Officer

Dec 21, 2018

Date

Contact Phone Number

Affiliated ETCs

[illegible]